

ORIGINAL

1 xunmeiind

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FILED
DISTRICT COURT OF GUAM

MAR 22 2006

MARY L.M. MORAN
CLERK OF COURT

8 Attorneys for the United States of America

9 IN THE UNITED STATES DISTRICT COURT

10 FOR THE DISTRICT OF GUAM

06-00012

11 UNITED STATES OF AMERICA,) CRIMINAL CASE NO. _____
12)
13 Plaintiff,)
14 vs.)
15 XUN BING MEI)
a/k/a XUE BING MEI)
a/k/a CHIU PUNG HO,)
17 Defendant.)
18 _____
19 THE GRAND JURY CHARGES:

INDICTMENT

FALSE USE OF PASSPORT
[18 U.S.C. §§ 1543 & 2]

VISA FRAUD
[18 U.S.C. §§1546 & 2]

COUNT I - FALSE USE OF PASSPORT

20 On about March 7, 2006, in the District of Guam and elsewhere, the defendant herein,
21 XUN BING MEI aka XUE BING MEI aka CHIU PUNG HO, did willfully and knowingly use
22 and attempt to use a false passport in an attempt to enter the United States, by presenting to a
23 U.S. Customs and Border Inspector a Portugese passport, number R 294458, in the name of Chiu
24 Pung Ho, and defendant knowing said passport was false, altered and did not belong to her, in
25 violation of Title 18, United States Code, Sections 1543 and 2.
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COUNT II - VISA FRAUD

On or about March 7, 2006, in the District of Guam and elsewhere, the defendant here, XUN BING MEI aka XUE BING MEI aka CHIU PUNG HO, did knowingly utter a document prescribed by statute or regulation for entry into or as evidence of authorized stay or employment in the United States, which the defendant knew to be falsely made or procured by means of a false claim or statement or otherwise procured by fraud or unlawfully obtained, to wit: Defendant presented an I-94 Form to Customs and Border Patrol Agents in order to gain entry into the United States at the Guam International Airport, said document indicating that she was Chiu Pung Ho, born in 1979 when in fact she is Xun Bing Mei or Xue Bing Mei, born in 1973, in violation of Title 18, United States Code, Sections 1546(a) and 2.

Dated this 22nd day of March, 2006.

A TRUE BILL.

Foreperson

LEONARDO M. RAPADAS
United States Attorney
Districts of Guam and NMI

By: ROSETTA L. SAN NICOLAS
Assistant U.S. Attorney

Approved:

Frederick A. Block for R.S.

RUSSELL C. STODDARD
First Assistant U.S. Attorney